

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

SCARLETT PAVLOVICH,

Plaintiff,

v.

NEIL GAIMAN, AMANDA PALMER,

Defendants.

Case No.: 3:25-CV-00078-JDP

**DECLARATION OF DYLAN
SCHMEYER**

I, Dylan Schmeyer, declare as follows:

1. I am an attorney with Kamerman, Uncyk, Soniker & Klein, P.C., counsel to Plaintiff in this action. I make this declaration based on my personal knowledge of the facts herein, and could and would testify to them competently if necessary.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the Biography page on Defendant Neil Gaiman's professional website, available on the internet at https://www.neilgaiman.com/About_Neil/Biography.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the January 15, 2025 journal entry on Defendant Neil Gaiman's professional website, available on the internet at <https://journal.neilgaiman.com/2025/01/breaking-silence.html>.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the Notice of Appearance of William Fick on behalf of Defendant Amanda Palmer, ECF No. 5 in *Parlovich v. Palmer*, Case No. 1:25-cv-10263 (D. Mass 2025). Attorney Fick has confirmed to me that Ms. Palmer intends to litigate the claims against her in the District of Massachusetts.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the Companies House Officers listing for NEVERWHERE LLP, showing Neil Gaiman's country of residence as the

United States. This information is also available online at <https://find-and-update.company-information.service.gov.uk/company/OC417548/officers>.

6. Attached hereto as **Exhibit 5** is a post to Amanda Palmer's Instagram, dated September 17, 2024, and available online at <https://www.instagram.com/p/DABXZ85xiMc/>.

7. Attached hereto as **Exhibit 6** is a true and correct copy of the Affidavit of Service made on Amanda Palmer personally at her address in Lexington, MA, filed as ECF No. 9 in *Pavlovich v. Palmer*, Case No. 1:25-cv-10263 (D. Mass 2025).

8. Attached hereto as **Exhibit 7** is a true and correct copy of a quit-claim deed registered as Document No. 638869 in the Dunn County, WI Register of Deeds, showing Mary T. Gaiman as Grantor and Neil R. Gaiman as Grantee for Parcels 16228132813-00005, -00006, -00007, and -00008 in the Town of Menomonie, Wisconsin, as retrieved from the Dunn County portal by my office on April 10, 2025.

9. Attached hereto as **Exhibit 8** is a true and correct copy of the Property Summary for Dunn County, WI Parcel 16228132813-00012 as retrieved from the Dunn County portal by my office on April 10, 2025, showing that it is a child parcel of 16228132813-00006 as deeded to Neil Gaiman in Exhibit 7 and that it is currently owned by Neil R. Gaiman and bears the address of E3988 550th Ave. in Menomonie, WI.

10. Attached hereto as **Exhibit 9** is a true and correct screenshot of a post to Neil Gaiman's account on the social media site Bluesky, @neilhimsself.neilgaiman.com, on November 12, 2023, in which he references "the basement of my Wisconsin house." This post is available online at <https://bsky.app/profile/neilhimsself.neilgaiman.com/post/3ke2d2k6vxs2r>.

11. Attached hereto as **Exhibit 10** is a true and correct screenshot of a post to Neil Gaiman's account on the social media site X (formerly known as Twitter), @neilhimsself, on September 14, 2020, which reads "You need to add English authors in Wisconsin to your list. I've

had a green card since 1992, have four American children, and an American wife.” This post is available online at <https://x.com/neilhimsself/status/1305552827008385024>.

12. Attached hereto as **Exhibit 11** is a true and correct printout of the flight time and cost between Edinburgh, Scotland and Auckland, NZ.

13. Attached hereto as **Exhibit 12** is a true and correct printout of the flight time and cost between Edinburgh, Scotland and Madison, WI.

14. Attached hereto as **Exhibit 13** is a true and correct screenshot showing that William Fick, Amanda Palmer’s counsel in *Pavlovich v. Palmer*, Case No. 1:25-cv-10263 (D. Mass 2025), is admitted to practice in Massachusetts. I performed a search for Mr. Fick in the attorney registration database for the New Zealand Law Society, the national regulator and representative body of the legal profession in Aotearoa New Zealand. No William Fick is registered to practice law with the New Zealand Law Society.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed this the 11th day of April 2025, at Thornton, CO.

By: /s/ Dylan M. Schmeyer
Dylan M. Schmeyer